

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Iva Bonelli

Debtor(s)

CHAPTER 13

vs.

NO. 20-14471 ELF

Nationstar Mortgage LLC d/b/a Mr. Cooper
Respondent

and

KML Law Group, P.C.

Respondent

William C. Miller Esq.

Trustee

**STIPULATION RESOLVING DEBTOR'S MOTION FOR CONTEMPT FOR
VIOLATION OF THE AUTOMATIC STAY AND FOR LIMITED STAY RELIEF**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. On September 16, 2021, Debtor filed a Motion for Contempt for Violation of the Automatic Stay against Respondents, Nationstar Mortgage LLC d/b/a Mr. Cooper and KML Law Group, P.C. (hereinafter referred to as "Respondents").

2. The Parties have reviewed the claim in depth to come to a resolution of this matter, with the terms as follows:

- a. Debtor will withdraw her Motion for Contempt.
- b. Neither party admits any wrongdoing in regard to this matter.
- c. Respondents will pay Debtor's attorney's fees in the amount of \$ 4,000.00.
- d. Nationstar Mortgage, LLC d/b/a Mr. Cooper shall issue payment to Anthony Frigo, Esq. within 14 days of receipt of this entered stipulation and a W-9 from Frigo.
- e. This Stipulation resolves all allegations of violations of the automatic stay as to Nationstar Mortgage LLC d/b/a Mr. Cooper, KML Law Group, P.C., the underlying investors on the loan, and/or any agents or parties acting on their behalf up to the date of the entry of the Stipulation.

f. Nothing in this Stipulation shall prohibit Debtor from filing applications for sanctions for any future alleged violations of the automatic stay.

g. Further, Nationstar Mortgage, LLC d/b/a Mr. Cooper is granted limited stay relief from the automatic stay to file an adversary proceeding in this bankruptcy case to determine whether the mortgage in this matter was satisfied in error and should be restored.

3. Debtor has requested that Nationstar Mortgage, LLC d/b/a Mr. Cooper is to cease sending monthly statements, and Nationstar Mortgage, LLC d/b/a Mr. Cooper is permitted to stop sending statements to Debtor that would otherwise be required by state or federal law or regulation until such time as Debtor requests that statements be sent again.

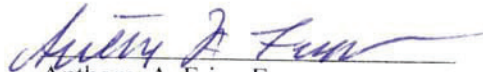
4. The parties agree that a facsimile signature shall be considered an original signature.

Date: 10/20/2021



Brian C. Nicholas, Esq.
Attorney for Respondents

Date: 10/29/2021



Anthony A. Frigo Esq.
Attorney for Debtor(s)

ORDER

Approved by the Court this 27th day of October, 2021.



Bankruptcy Judge
Eric L. Frank

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Iva Bonelli : Chapter 13
: No. 20-14471
:

CERTIFICATE OF SERVICE

TO THE CLERK OF THE BANKRUPTCY COURT:

I, Anthony A. Frigo, Esquire, Attorney for the Debtor(s), hereby certify that a true and correct copy of the foregoing Stipulation Resolving Debtor's Motion for Contempt for Violation of the Automatic Stay and for Limited Stay Relief has been served this 21st day of October 2021, by First Class United States Mail, postage prepaid or electronic means upon the Trustee listed below and all interested parties:

Dated: October 21, 2021

/S/ Anthony A. Frigo

Anthony A. Frigo, Esquire
175 Strafford Ave., Suite One
Wayne, PA 19087
610.687.7784

Ken West
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105

Anthony A. Frigo
175 Strafford Ave., Suite One
Wayne, PA 19087

Iva Bonelli
13 Landmark Drive
Malvern, PA 19355

Mr. Michael McKeever
c/o KML Law Group, P.C.
Suite 5000 -BNY Independence Center
701 Market Street
Philadelphia, PA 1910-1532
Via Email: mmckeever@kmlawgroup.com

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All Interested Parties